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EXECUTIVE SECRETARY

Guy M. Hicks
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VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Complaint by AT&T Regarding the Provisions of Calling Name Delivery
by BellSouth Telecommunications, Inc.*
Docket No. 00-00971

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Response to Petitions to Intervene. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

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BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Complaint by AT&T Regarding the Provisions of Calling Name Delivery
by BellSouth Telecommunications, Inc.*

Docket No. 00-00971

BELLSOUTH RESPONSE TO PETITIONS TO INTERVENE

BellSouth Telecommunications, Inc. ("BellSouth") opposes the petitions to intervene filed by XO Tennessee, Inc. ("XO"), the Southeastern Competitive Carriers Association ("SECCA") and Time Warner Telecom of the MidSouth, LP ("Time Warner"). XO and SECCA argue that they should be allowed to intervene in this proceeding because they " ... have experienced the same problem with Calling Name Service that are described in AT&T's complaint." Time Warner does not even claim in its petition that it has experienced a problem with Calling Name Service.

These Petitions all fail to recognize that the Authority convened this proceeding very quickly in order to address one specific complaint raised by AT&T with respect to one specific customer. Because the Authority apparently believed that time may be of the essence with regard to this one complaint, it significantly truncated the typical time period for BellSouth to respond to AT&T's complaint and required BellSouth to file a written response in less than a full working week. The TRA then appointed a hearing officer to decide the case on the merits, and it required the parties to appear that very day for a conference with the hearing officer.

Neither XO, SECCA, nor Time Warner make any specific allegations whatsoever, and nothing in their Petitions even remotely suggests that time is of the essence with regard to any unspecified matters they wish to inject into this proceeding. Nor do they explain why an expedited schedule is warranted with regard to such unspecified matters. Moreover, the Authority noted the fact that there had been some previous discussions already between AT&T and BellSouth with respect to this particular end-user and that, presumably, BellSouth would be in a position to respond quickly with respect to this specific customer's complaint. Nothing in the Petitions suggests that this is true with regard to XO, SECCA, or Time-Warner.

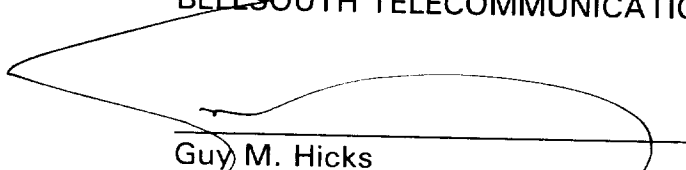
BellSouth, therefore, believes that this expedited proceeding was convened by the Authority to address the particular end-user complaint referenced in AT&T's filing of October 30. BellSouth does not believe that the Authority intended to convene a generic type proceeding – had that been the intent, surely BellSouth would have been given more than a few days to address this matter in writing. Nor does BellSouth believe that the Authority intended to empower the Hearing Officer to rule on the merits of anything beyond this particular customer's complaint. Finally, BellSouth believes that the orderly and prompt conduct of the proceeding will be impaired by allowing the intervention of the petitioners, in that they are attempting to broaden the scope of a proceeding intended to address what was presumed by the Authority to be a specific situation in which time may be of the essence.

In the alternative, if the Hearing Officer decides to grant these petitions, BellSouth urges the Hearing Officer to grant only a conditional intervention pursuant to T.C.A. §4-5-310(c). Specifically, given the specific and expedited nature of this proceeding, the Petitioners should be restricted to addressing only the facts related to the specific customer complaint described by AT&T. The Petitioners should not be allowed to use this expedited proceeding as a forum for airing unspecified grievances against BellSouth.

Therefore, BellSouth requests that the petitions to intervene be denied.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

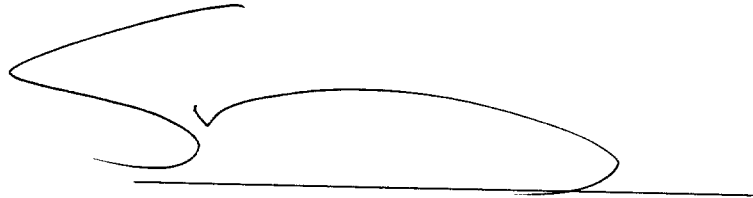
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A handwritten signature in black ink, consisting of a large, stylized 'S' or 'W' shape, followed by a horizontal line.